

Matthew R. Cleverley, OSB #93235  
Fidelity National Law Group  
1200 – 6<sup>th</sup> Avenue, Suite 620  
Seattle, WA 98101  
(206) 223-4525, ext. 103  
[Matthew.Cleverley@fnf.com](mailto:Matthew.Cleverley@fnf.com)  
Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
MEDFORD DIVISION

DONALD L. OLSON, as TRUSTEE OF THE  
OLSON LIVING TRUST,

Plaintiff,

v.

CHICAGO TITLE INSURANCE COMPANY,  
successor to TICOR TITLE INSURANCE  
COMPANY,

Defendant.

Case No. 1:15-cv-1692

NOTICE OF REMOVAL

(Josephine County Case #15-CV-20794)

TO: Clerk, United States District Court for the District of Oregon

And to: Plaintiff, DONALD L. OLSON, as TRUSTEE OF THE OLSON LIVING  
TRUST

And to: Carl A. Clyde, Esq., Attorney for Plaintiff

Defendant, Chicago Title Insurance Company (“CTIC”) hereby Removes the  
captioned cause, originally filed in Josephine County, Oregon Circuit Court, Case number 15-  
CV-20794, to the United States District Court for the District of Oregon. CTIC Removes the  
case pursuant to 28 U.S.C. §1332 and 28 U.S.C. §1441(b), on the following grounds:

NOTICE OF REMOVAL – 1

FIDELITY NATIONAL LAW GROUP  
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SEATTLE, WA 98101  
(206) 223-4525

1. On or about August 6, 2015, Plaintiff filed a Complaint in Josephine County, Oregon Circuit Court, Case number 15-CV-207944.
2. CTIC received a copy of the Summons and Complaint on August 13, 2015. This Notice of Removal is timely under 28 U.S.C. §1446(b) because it is within 30 days after CTIC received notice of the Summons and Complaint.
3. Copies of all additional records and proceedings in the State Court will be filed together with the Verification of State Court Records as required by 28 U.S.C. §1446(a).
4. Plaintiff is a citizen of the State of Oregon.
5. Defendant CTIC is a Nebraska corporation.
6. CTIC is the only Defendant having been served with a summons and complaint in this action.
7. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. §1332, and which may be removed to this court by Defendant CTIC pursuant to 28 U.S.C. §1441(b) as a civil action between citizens of different states and the matter in controversy exceeds the sum of \$75,000 exclusive of interest and costs.
8. The original case was filed in Josephine County, Oregon Circuit Court. Accordingly, this case should be assigned to the United States District Court for the District of Oregon, at Medford, pursuant to 12 U.S.C. §632 and Local Rule 3-2(a).

1 9. CTIC will promptly file a copy of this Notice with Deschutes County Circuit  
2 Court and all parties.

3 10. Pursuant to 28 U.S.C. §1332 and 28 U.S.C. 1441(b), no further action may occur  
4 in the state court unless and until the action is remanded.

5 Wherefore, Defendant CTIC respectfully gives notice that the above-entitled action is  
6 removed from the Deschutes County, Oregon Circuit Court to the U.S. District Court for the  
7 District of Oregon, Medford Division.

8  
9 Dated: September 8, 2015

/s/ Matthew Cleverley

Matthew R. Cleverley, WSBA #32055

Fidelity National Law Group

1200 – 6<sup>th</sup> Avenue, Suite 620

Seattle, WA 98101

(206) 223-4525, ext. 103

[Matthew.Cleverley@fnf.com](mailto:Matthew.Cleverley@fnf.com)

Attorney for CTIC

**CERTIFICATE OF SERVICE**

The undersigned certifies under the penalty of perjury under the laws of the State of Washington that I am now and at all times herein mentioned, a citizen of the United States, a resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above-entitled action, and competent to be a witness herein.

On the date given below I caused to be served the foregoing NOTICE OF REMOVAL on the following individuals in the manner indicated:

Carl A. Clyde OSB #095782	<input checked="" type="checkbox"/> U.S. Mail, proper postage affixed
Sorenson, Ransom & Ferguson, LLP	<input type="checkbox"/> Legal Messenger
133 NW D Street	<input type="checkbox"/> Facsimile
Grants Pass OR 97526	<input type="checkbox"/> Hand Delivery
541-476-3883 – Phone	<input checked="" type="checkbox"/> ECF/email
541-474-4495 – Fax	
<a href="mailto:ccl Clyde@roguevalleylaw.com">ccl Clyde@roguevalleylaw.com</a>	
Attorney for Plaintiff	

Dated: September 8, 2015

/s/ Matthew Cleverley  
Matthew R. Cleverley, WSBA #32055